

Saiber

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March 30, 2012

Via ECF and Telecopy

The Honorable Madeline Cox Arleo
United States District Court
for the District of New Jersey
M.L. King, Jr. Federal Building and Courthouse
50 Walnut Street, Room 2060
Newark, New Jersey 07102

Re: Picatinny Federal Credit Union v. CUMIS Insurance
Society, Inc.
Civil Action No. 11-04853 (WHW) (MCA)

Proponent Federal Credit Union v. CUMIS Insurance
Society, Inc.
Civil Action No. 11-05760 (WHW) (MCA)

Dear Magistrate Judge Arleo:

Pursuant to my discussion with Your Honor's law clerk, Jessica Stein Allen, and with the consent of all counsel, I write to request a four week adjournment of both the March 30 date for submission of letters addressing outstanding discovery disputes in the Picatinny action and the April 5 conference to resolve those disputes in that matter and establish a discovery schedule in both matters.

The basis for this request is that, following a lengthy meet and confer on March 27, the parties to the Picatinny action have agreed to supplement certain responses to discovery requests. I anticipate that those supplemental responses will be served within the next few weeks. Until the parties review the supplemental responses, they are unable to determine those discovery requests, if any, on which they will need the Court's intervention. If the supplemental responses are sufficient on both sides, the parties will proceed to

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depositions and will be able to discuss a discovery end date on the adjourned date of the status conference. If the supplemental responses are not sufficient, the parties will submit a joint letter on the adjourned submission date requesting the Court's assistance to address the outstanding issues.

I appreciate the Court's assistance in this matter.

Respectfully submitted,

JAMES H. FORTE

JHF/cr

cc: Arthur H. Aizley, Esq. (via ECF and regular mail)
Michael Davisson, Esq. (via ECF and regular mail)
Harvey Weissbard, Esq. (via ECF and regular mail)